

**UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE**

BENJAMIN M. GAMORAN, derivatively on behalf
of the nominal defendant with respect to its
series mutual fund, the Neuberger Berman
International Fund,

Plaintiff,

- against -

NEUBERGER BERMAN MANAGEMENT LLC, *et al.*,

Defendants,

- and -

NEUBERGER BERMAN EQUITY FUNDS d/b/a
NEUBERGER BERMAN INTERNATIONAL FUND,

Nominal
Defendant.

11 Civ. 751 (GMS)

**INVESTMENT ADVISOR DEFENDANTS' MOTION
TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

Defendants Neuberger Berman Management LLC, Neuberger Berman, LLC,
Benjamin Segal, Milu E. Komer, Peter E. Sundman, and Jack L. Rivkin (collectively, the
“Investment Advisor Defendants”), by and through their undersigned counsel, respectfully move
for an order in the form attached hereto transferring this action to the United States District Court
for the Southern District of New York. The grounds for this motion are set forth in the:

- Memorandum of Law in Support of the Investment Advisor Defendants’
Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a),
- the Declaration of Benjamin Segal in Support of the Investment Advisor
Defendants’ Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a), and
- the Declaration of Alan J. Stone in Support of the Investment Advisor
Defendants’ Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a).

The Investment Advisor Defendants respectfully state that they do not believe that oral argument on this motion is necessary.

Consistent with Local Rule 7.1.1, the undersigned counsel certify that a reasonable effort has been made, unsuccessfully, to reach agreement with Plaintiff's counsel on the matters set forth in this motion.

Dated: October 5, 2011

By: /s/ Alan J. Stone

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Benjamin Segal, Milu E. Komer, Peter E.
Sundman, and Jack L. Rivkin.*

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11 Civ. 751 (GMS)

**ORDER GRANTING INVESTMENT ADVISOR DEFENDANTS'
MOTION TO TRANSFER VENUE PURSUANT TO 28 U.S.C. § 1404(a)**

The Court, having considered the Investment Advisor Defendants' Motion to Transfer Venue Pursuant to 28 U.S.C. § 1404(a) (the "Motion"), and good cause having been shown therefore,

IT IS HEREBY ORDERED this _____ day of _____, 2011 that the Defendants' Motion is GRANTED.

U.S. DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on October 5, 2011, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused a true and correct copy of the foregoing document to be served on the following counsel by email and U.S. Mail.

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